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November 5, 2019

**Via ECF**

Hon. P. Kevin Castel  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Hai v. First Data Corporation, et. al.* (Case No. 1:19-cv-8332-PKC)**  
**Request to Adjourn Initial Conference, or Appear by Telephone**

Dear Judge Castel:

This Firm represents Defendants First Data Corporation and Fiserv, Inc. An initial pre-trial conference is currently scheduled in this matter for November 8, 2019 at 11:45 am.

The initial pre-trial conference was originally scheduled for November 4, 2019, but was adjourned to November 8, 2019. (ECF No. 16). On November 8, 2019 Defendants' counsel are scheduled to attend the American Bar Association Labor and Employment Law Conference in New Orleans, LA. Therefore, Defendants respectfully request that the Court adjourn the conference to November 12, 2019, or November 13, 2019. Alternatively, Defendants' counsel request the ability to participate in the November 8, 2019 conference by telephone.

This is Defendants' first request to adjourn the initial conference, except for the request based upon Defendants' original intent to move for partial dismissal, which was voluntarily withdrawn. (ECF Nos. 9, 13). Plaintiff's counsel has noted her consent to adjourn the conference to November 12, or 13, but stated that if such dates are unavailable, the conference should proceed as scheduled on November 8.

Thank you for your consideration.

Respectfully submitted,

*/s/ Erik P. Pramschufer*  
Erik P. Pramschufer, Esq.

cc: All counsel (via ECF)

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